FCC REPLY COMMENTS

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Re:
Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications
PS Docket No. 11-153

Framework for Next Generation 911 Deployment - PS Docket No. 10-255

We would like to make a number of points about using IP-Relay Services to call 9-1-1. Donna Platt has sent her comments to FCC NPRM Proceeding number 10-255 and 11-153 explaining about why she didn't support using IP-Relay Service to call 9-1-1 – see link http://fjallfoss.fcc.gov/ecfs/document/view?id=7021750426.

This current reply comment will describe in depth on the issues of IP-Relay Services and 9-1-1 calls.

IP Relay as Interim Solution

We opposed the Internet Protocol (IP)-Relay service as interim solution to call 9-1-1 emergency services instead of direct text messaging to 9-1-1 as proposed by the Alliance for Telecommunications Industry Solutions (ATIS) - http://www.atis.org/PRESS/pressreleases2011/121311.html

The 3rd party IP-relay and Video Relay Services (VRS) in the United States began in 2002. Since then, many people who are Deaf, Deaf-Blind and Hard of Hearing utilize videophone, smart phones, and computer more and more often than using TTYs. These users felt it was costly to pay for all three services; landline, high speed and wireless carrier so they decided to terminate the landline services since they use TTYs less often.

Since they have terminated their landline services, they assumed that relay service providers were accessible for 9-1-1 calling needs. In the early days of the industry, prior to the Ten Digit Numbering (TDN) requirements, relay providers were not equipped to connect 9-1-1 calls though and they warned customers to continue to use their TTY for 9-1-1. Nevertheless, consumers still called through VRS or IP relay service in emergency situations and CAs, faced with a person in need, would attempt to connect them even though the system was not ready. Due to the obvious need for Internet relay services to be accessible for 9-1-1 calls, the FCC intervened and established the current set of requirements.

In 2008, the FCC mandated 10-Digit Numbering Plan implementation that would connect users of Internet-based relay services with each other, with hearing people and 9-1-1 services using just one local telephone number. This requires users to register with their preferred relay service providers. When the 9-1-1 relayed call is being made, the caller information is to be electronically passed through and populated on PSAP ANI/ALI screen. Unfortunately it is still an issue.

Voice over Internet Protocol (VoIP) telephony is a challenge for the emergency services industry. These issues are further complicated by the nature of relayed calls – having a third party or more involved in the call flow. Many relay service providers have contract with vendors for automatic and/or manual routing services. Most would choose manual, which meet their financial status. Sadly, many relayed calls would go through emergency, non-emergency or administration line instead of 9-1-1 line and the caller information doesn't show on the ANI/ALI screen.

We applaud VRS and IP Relay Service Providers for making every effort to facilitate 9-1-1 emergency calls quickly as possible. Number of 9-1-1 test calls via both IP- relay and VRS were conducted. Here are examples:

- **August 2006** – Richard conducted 9-1-1 test calls using 7 video relay services. These tests revealed 4 terminated at LAPD 911 Communications Center; 1 transferred to wrong PSAP and then technical problem, no call back; 1 call transferred to a non-working number, Video Interpreter did not offer to attempt a different connection; 2 disconnected never reaching a Video Interpreter, no call back; 1 call experienced technical problem no connection to a PSAP nor a call back from the VRS provider. Connect time to reach PSAP ranged from 1 minute and 55 seconds to 4 minutes and 18 seconds. The average connecting time to PSAP – 2 minutes and 53 seconds**.**
- **October 2007** – During the NENA Joint Committee meeting, one attendee was informed that his call taker from his PSAP received an IP Relay Service call regarding a house fire. The relayed call reached an inappropriate PSAP because of a different state.
- **October 2009** - During the training to telecommunicators, Donna made two IP-relay test calls which both times calls were dropped after the address was given.
- **March 2009** – Donna's IP-relay test call took 5 minutes and 52 seconds to connect to PSAP. It was shown during the training to telecommunicators.
- **April 2010** – Donna conducted IP-relay test call which took over 4 minutes to connect to PSAP during the training to telecommunicators.
- **June 2010** – Demonstration of 9-1-1 test calls via VRS and IP relay was conducted at the NENA Annual conference. Donna Platt used the IP relay service which took over 4 minutes to reach PSAP. Richard Ray used VRS which took over 5 minutes.
- **August 2010** - A series of 9-1-1 test calls using 9 different VRS providers were conducted. Only 2 relay service providers connected calls to appropriate PSAPs via 9-1-1 line while the rest were either routed to another city or local PSAP via administrative or emergency line. Several calls were dropped and no callbacks were conducted. Some relay service providers showed Richard's old address

which has been changed one year earlier as well as few months earlier. The caller information hasn't been maintained in a timely manner.

- **December 2011 -** a Deaf woman, Krystallo Tziallila and her twins were involved in vehicle crash and she has tried calling 9-1-1 via VRS which didn't get through. The relay agent could not determine which one of the five numbers for a local police station to call for help. Please see the link http://fjallfoss.fcc.gov/ecfs/document/view?id=7021750685.
- **November 2011** - Another Deaf person, William Thomas Ennis III tried to call 9-1-1 via Video Relay Service which took him approximately 8 minutes to reach PSAP – see this link http://fjallfoss.fcc.gov/ecfs/document/view?id=7021753090
- **January 2012** - Two 9-1-1 test calls to local Los Angeles Police Department (LAPD) PSAP utilizing using mobile iPad, which is registered to Maryland address, were conducted. The first call took over 4 minutes and 15 second to reach PSAP and second call took 1 minute and 40 seconds. There were steps involved for all parties before a call is connected to PSAP. Upon connecting to Video Interpreter, user utilizing sharing location feature to provide location information; Interpreter connected to Emergency Interpreter; manually calling to VPC; call was routed to PSAP.

In the past 5 years, the results of 9-1-1 calls via both VRS and IP relay services remain the same.

Emergency Access Advisory Committee (EAAC) Survey Report

The Emergency Access Advisory Committee under FCC in compliance with the Twenty-First Century Communication and Video Accessibility Act (CVAA) of 2010 developed and distributed national survey nationwide asking people with disabilities to share their experiences calling 9-1-1 and which communication modes would help them if they call 9-1-1 in future. We'd like to reiterate several critical points from the national survey report http://transition.fcc.gov/cgb/dro/EAAC/EAAC-REPORT.pdf .

- Question 16 on page 23: As for texting options to use to call 9-1-1, 45.1% prefer text; 45.7% on real time text; 43.7% on email. Calling 9-1-1 via relay service shows 25.7%
- Question 22 on page 29: 77% of respondents say it is very important to have direct access to 9-1-1 rather than via relay service, with a further 15% percent saying it is somewhat important. Only 4% say it is not very important, and only another 4% say that it is not important at all. In other words, 92% say it is important to call 9-1-1 directly.
- Question 23 on page 30: 83% prefers to use same device as the one they use for everyday communication to call 9-1-1 is very important and somewhat important to another 12%. Only 2% say it is not very important, and only 3% say it is not important at all.

It is imperative that individuals who are deaf, deaf-blind, hard of hearing, or have a speech disability have the ability to call 9-1-1 directly via SMS through the use of simple, easy-to-remember three digit dialing code, 9-1-1.

A few minutes delay has shown that it could have led to death. EVERY SECOND COUNTS! It should not be every minute count!

Thank you for taking these aforementioned issues into consideration. Please contact us if you have further questions.

Richard Ray
Donna Platt